

Hearing Date and Time: April 21, 2011 at 2:00 p.m. (ET)
Objection Deadline: March, 25 2011 at 4:00 p.m. (ET)

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:	
	:	
TERRESTAR NETWORKS INC., <i>et al.</i> ,	:	Chapter 11
	:	Case No. 10-15446 (SHL)
Debtors.	:	(Jointly Administered)
	:	
-----	X	
SPRINT NEXTEL CORPORATION and	:	
THE OFFICIAL COMMITTEE OF	:	
UNSECURED CREDITORS OF	:	
TERRESTAR NETWORKS INC., <i>et al.</i> ,	:	Adv. Pro. No. 10-05461-SHL
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
U.S. BANK NATIONAL ASSOCIATION,	:	
in its capacity as Indenture Trustee and	:	
Collateral Agent for the 15.0% Senior	:	
Secured Payment-In-Kind Notes due 2014,	:	
	:	
Defendant.	:	
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**NOTICE OF MOTION FOR SUMMARY JUDGMENT
OF PLAINTIFF, THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS OF TERRESTAR NETWORKS INC, et al.**

PLEASE TAKE NOTICE that upon the Declaration of David M. Posner, dated March 11, 2011, and the exhibits annexed thereto, the Statement of Material Facts as to Which there are No Genuine Issues to be Tried of Plaintiff Official Committee of Unsecured Creditors of TerreStar Networks Inc., *et al.* (the “Committee”), and the Committee’s accompanying Memorandum of Law, together with all prior pleadings and proceedings had herein, the Committee will move this Court on April 21, 2011 at 2:00 p.m. before the Honorable Sean H. Lane, U.S.B.J., at the United States Court House located at One Bowling Green, New York, New York 10004-1408 pursuant to Rule 56 of the Federal Rules of Civil Procedure for an Order: (a) granting the Committee summary judgment on the First Claim in the Committee’s Complaint against defendant U.S. Bank National Association (“U.S. Bank”) declaring (i) that a present, justiciable controversy exists regarding whether the liens purportedly granted pursuant to the Security Agreement granted enforceable security interests in the FCC Licenses described within the Complaint, and (ii) that U.S. Bank and the Senior Secured Noteholders (as defined within the Complaint), on whose behalf U.S. Bank acts as agent, do not have a valid security interest in the FCC Licenses; and (b) granting the Committee summary judgment on the Second Claim in the Committee’s Complaint against defendant U.S. Bank declaring (i) that a present, justiciable controversy exists regarding whether the pre-petition liens in the proceeds of the FCC Licenses purportedly granted pursuant to the Security Agreement attach to any proceeds or value derived from the FCC Licenses after the filing of the Bankruptcy Case, and (ii) that the pre-petition liens in the proceeds of the FCC Licenses purportedly granted pursuant to the Security Agreement do not attach to any proceeds or value derived from the FCC Licenses after the filing of the Bankruptcy

Case; all together with such other and further relief as the Court deems just, equitable and proper.

Dated: New York, New York
March 11, 2011

Respectfully submitted,

**OTTERBOURG, STEINDLER,
HOUSTON & ROSEN, P.C.**

By: /s/ David M. Posner
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Members of the Firm

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